

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

BLANCA P. CEDILLOS-GUEVARA, <i>et al.</i> , :	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. GLR-14-196
	:	
MAYFLOWER TEXTILE SERVICES CO., :	:	
<i>et al.</i> ,	:	
	:	
Defendants.	:	
_____	:	

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND RELEASE**

Plaintiffs and Defendants Mayflower Textile Services Co., Mukul M. Mehta, Service Industry Solutions, Inc., Andrey Gustov, and First Management, Inc. (collectively, “Defendants”), through counsel, submit this Memorandum of Law in Support of the Parties’ Joint Motion for Approval of Settlement Agreement and Release, and respectfully request that this honorable Court approve the settlement that the parties have reached concerning all claims asserted by Plaintiffs against Defendants, including the Plaintiffs’ claims under the Fair Labor Standards Act (hereinafter, “FLSA”) 29 U.S.C. 201, *et seq.* For the reasons set forth in the accompanying Memorandum of Law, the Parties seek Court approval of the settlement because claims under the FLSA, such as those released by the Plaintiffs in the Settlement Agreement and Release, may not be waived or released without U.S. Department of Labor or Court approval. WHEREFORE, the parties request that the Court approve the settlement of Plaintiffs’ FLSA claims as fair and reasonable and dismiss Plaintiffs’ claims against Defendants, with all parties bearing their own costs, with prejudice.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

THIS WILL CERTIFY that on this 25th day of April 2017, a copy of the foregoing was served via electronic filing on all counsel of record and via first class mail upon the following:

John Williams  
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Valentin Abgaryan  
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/s/  
Russell B. Berger